



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 25, 1999

Eric W. Bloom, Esq.
Winston & Strawn
1400 L. Street, N.W.
Washington, D.C. 20005

RE: MUR 4884
Future Tech International, Inc., *et al.*

Dear Mr. Bloom:

On March 16, 1999, the Federal Election Commission found that there is reason to believe your client Future Tech International, Inc. violated 2 U.S.C. § 441e and knowingly and willfully violated 2 U.S.C. §§ 441b(a) and 441f, provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). At the same time the Commission also found that there is reason to believe two corporations closely associated with Future Tech -- MarkVision Computers, Inc., and MarkVision Holdings, Inc., -- knowingly and willfully violated 2 U.S.C. §§ 441b(a) and 441f, and 2 U.S.C. § 441f, respectively.

The Commission further found that there is reason to believe four named Future Tech officers, Juan Ortiz, Louis Leonardo, Leonard Keller and Gregorio Narvasa, knowingly and willfully violated 2 U.S.C. §§ 441b(a) and 441f. The Factual and Legal Analysis, which formed a basis for the Commission's findings, is attached for your information.

Last, the Commission found that there is reason to believe the following Future Tech employees, and spouses, violated 2 U.S.C. § 441f by knowingly allowing their names to be used by Mr. Jimenez, Future Tech and related corporations in making the prohibited federal contributions at issue, but decided to take no further action as concerns these individuals: Lidia Azambuja, Ernesto Bonfante, Marcelino Brotonel, Edgar Crespo, Marcel Crespo, Reynaldo Crespo, Ricardo Crespo, Jacob Del Valle, Raymund dos Remedios, Rene dos Remedios, Richard Esparragoza, Jorge O. Fenton, David Fried, Manuel Garcia, William Gearhart, Luz Gonzalez, Daria Haycox, Marcia Juan, Michael Marchese, Robert Nowell, Maria C. Ortiz, Ruth Ramirez, Juan Ruiz, Rolan Sacramento, Enrique Sanchez, and Jennifer C. Seijas. Separate Factual and Legal Analyses addressing these individuals' violations are also attached.

In order to expedite the resolution of this matter, the Commission has also decided to offer to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

If the parties agree with the provisions of the enclosed agreement, please return the agreement signed, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

please
provide this office with all documentation and other information concerning the solicitation, transmission and acceptance of the contributions at issue. Of particular interest to this Office are the involvements of Marvin Rosen, Charles "Bud" Stack, and the law firms associated with these individuals, and of Howard Glicken in the solicitation and acceptance of the contributions at issue.

Please submit all responsive materials, and any other factual or legal materials that you believe are relevant to the Commission's consideration of this matter, within fifteen days of receipt of this letter. Where appropriate, statements should be submitted under oath. In the absence of additional information, and failure to reach pre-probable cause settlement, the Commission may find probable cause to believe that a violation has occurred and proceed with post-probable cause conciliation.

Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

This matter will remain confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jose M. Rodriguez, the attorney assigned to this matter, at (202) 694-1650.

Sincerely,



Scott E. Thomas
Chairman

Enclosures

Future Tech *et al.* Factual and Legal Analysis (1)
Conduit Employees Factual and Legal Analyses (26)
Procedures
Conciliation Agreement

cc: Thomas E. Wilson, Esq.
William F. Coffield, Esq.
John F. Conroy, Esq.
John Perazich, Esq.

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: Future Tech International, Inc.
MarkVision Holdings, Inc.
MarkVision Computers, Inc.
Leonard Keller
Juan M. Ortiz
Louis Leonardo
Gregorio P. Narvasa

MUR: 4884

I. GENERATION OF MATTER

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. *See* 2 U.S.C. § 437g(a)(2). On December 1, 1997, the Commission received a *sua sponte* submission filed by counsel for Mark Jimenez, Chief Executive Officer ("CEO") of Future Tech International, Inc. ("Future Tech"), disclosing that the corporation, at the instruction of Mr. Jimenez, reimbursed various employees via company bonuses for contributions to federal candidate committees totaling approximately \$40,000 made between February 1994 and September 1996. In response to requests from the Commission, on March 23, 1998, counsel filed a supplement to the *sua sponte* disclosing that Future Tech and Mr. Jimenez made approximately \$110,000 in contributions to the Democratic National Committee's ("DNC's") non-federal account between May 1993 and March 1994, at a time when Mr. Jimenez was a foreign national.¹

¹ Based on the supplemental submission and other information within the Commission's possession, it also appears that Mr. Jimenez further reimbursed employees for between \$20,500 and \$21,500 in contributions to the campaigns of two Dade County Mayoral candidates. These transactions concerning local candidates do not raise any FECA implications and are therefore not at issue in this matter.

Subsequent to the *sua sponte* submission, on approximately December 17, 1998, Future Tech and its Chief Financial Officer ("CFO") entered into separate plea agreements with the Department of Justice ("DOJ") concerning criminal violations arising from the same activity as that at issue in this matter. In its plea agreement, Future Tech pleads guilty to two counts of evading corporate income taxes for the years 1994 and 1995, by reporting false salaries, wages and deductions associated with the contributions at issue in this matter. See Plea Agreement Between Future Tech International, Inc. and the United States of America dated December 17, 1998 ("Future Tech Plea Agreement"), at ¶ I.A. In his separate plea agreement, Future Tech's CFO, Juan M. Ortiz, pleads guilty to one count of knowingly and willfully allowing his name to be used to make a \$1,000 corporate contribution to the Clinton/Gore campaign in 1996. See Plea Agreement Between Juan M. Ortiz and the United States of America dated December 17, 1998 ("Ortiz Plea Agreement"), at ¶ I.A. The plea agreements impose maximum fines of approximately \$1M and \$25,000 dollars, respectively. See Future Tech Plea Agreement at ¶ I.G; Ortiz Plea Agreement at ¶ I.F.

Pursuant to the plea agreements, Respondents produced Factual Resumes which substantially supplant the original *sua sponte* submission in this matter and provide a detailed and credible record of the transactions at issue. See Future Tech International, Inc. Factual Resume dated October 5, 1998 ("Future Tech Factual Resume"); Juan M. Ortiz Factual Resume dated October 2, 1998 ("Ortiz Factual Resume"). These Factual Resumes disclose the involvement in the violations at issue of four Future Tech officers, Leonard Keller (Secretary), Juan M. Ortiz (CFO), Louis Leonardo (President) and

Gregorio P. Narvasa (Treasurer), as well as the involvement of two corporations closely related to Future Tech, MarkVision Holdings, Inc. and MarkVision Computers, Inc.

Based on information disclosed by Future Tech and its CFO in their plea agreements and accompanying Factual Resumes, the Commission found that there is reason to believe that Future Tech violated 2 U.S.C. § 441e. The Commission further found that there is reason to believe that Future Tech, its four identified officers and the two related corporations knowingly and willfully violated 2 U.S.C. §§ 441b(a) and 441f.

II. FACTUAL AND LEGAL ANALYSIS

A. Applicable Law

The Federal Election Campaign Act of 1971, as amended ("the Act"), sets forth limitations and prohibitions on the type of funds which may be used in elections. Section 441b(a) states that it shall be unlawful for a corporation to make a contribution or expenditure in connection with any election to any federal political office, and for any officer or director of any corporation to consent to any contribution or expenditure by the corporation. For purposes of section 441b(a) a contribution includes any direct or indirect payment, distribution, loan, advance, deposit or gift of money, or any services, or anything of value made to any candidate for federal office. *See* 2 U.S.C. § 441b(b)(2).

Section 441e states that it shall be unlawful for a foreign national directly or through any other person to make any contribution of money or other thing of value in connection with an election to any political office; or for any person -- including any political committee -- to solicit, accept, or receive any such contribution from a foreign national. 2 U.S.C. § 441e(a); 11 C.F.R. § 110.4(a). The Commission has consistently

applied this prohibition to both federal and non-federal elections. See MURs 2892, 3460, 4398 and 4638.²

The term "foreign national" is defined at 2 U.S.C. § 441e(b)(1) as, *inter alia*, a "foreign principal" as that term is defined at 22 U.S.C. § 611(b). Under Section 611(b), a "foreign principal" includes a person outside the United States, unless it is established that such person is an individual and a citizen of and domiciled within the United States, or that such person is not an individual and is organized under or created by the laws of the United States or of any State or other place subject to the jurisdiction of the United States and has its principal place of business within the United States. The Act further provides that resident aliens are excluded from the definition of "foreign national." See 2 U.S.C. § 441e(b)(2). The prohibition is further detailed in the Commission's Regulations at 11 C.F.R. § 110.4(a)(3). This provision states that a foreign national shall not direct, dictate, control, or directly or indirectly participate in the decision-making process of any person, including a corporation, with regard to that person's federal or non-federal election-related activities, such as decisions concerning the making of contributions or expenditures in connection with elections for any local, state, or federal office or decisions concerning the administration of a political committee.

In addressing the issue of whether a domestic subsidiary of a foreign national parent may make contributions in connection with local, State or Federal campaigns for political office, the Commission has looked to two factors: the source of the funds used

² One district court recently held the foreign national prohibition at Section 441e applicable only to "contributions" for federal elections. See *U.S. v. Trie*, Crim. No. 98-0029-1 (PLF) (D.D.C. Oct. 9, 1998). However, this lower court opinion failed to consider either the legislative history establishing the provision's broad scope or the Commission's consistent application of the prohibition to non-federal elections.

to make the contributions and the nationality status of the decision makers. Regarding the source of funds, the Commission has not permitted such contributions by a domestic corporation where the source of funds is a foreign national, reasoning that this essentially permits the foreign national to make contributions indirectly when it could not do so directly. *See, e.g.*, A.O.s 1989-20, 2 Fed. Election Camp. Guide (CCH) ¶ 5970 (Oct. 27, 1989); 1985-3, 2 Fed. Election Camp. Guide (CCH) ¶ 5809 (March 4, 1989); and 1981-36, 2 Fed. Election Camp. Guide (CCH) ¶ 5632 (Dec. 9, 1981). *See also*, A.O. 1992-16, 2 Fed. Election Camp. Guide (CCH) ¶ 6059 (June 26, 1992).

Even if the funds in question are from a domestic corporation, the Commission also looks at the nationality status of the decision makers. *See* A.O.s 1985-3 and 1982-10, 2 Fed. Election Camp. Guide (CCH) ¶ 5651 (March 29, 1982). The Commission has conditioned its approval of contributions by domestic subsidiaries of foreign nationals by requiring that no director or officer of the company or its parent, or any other person who is a foreign national, participate in any way in the decision-making process regarding the contributions. This prohibition has been codified at 11 C.F.R. § 110.4(a)(3), as noted above.

Accordingly, it is clear that the Act prohibits contributions from foreign nationals, as well as contributions from domestic corporations where either the funds originate from a foreign national source or a foreign national is involved in the decision concerning the making of the contribution.

The Act further prohibits any person from making a contribution in the name of another person, knowingly permitting their name to be used to effect such a contribution.

or knowingly accepting a contribution made by one person in the name of another person.

2 U.S.C. § 441f. The Act defines person to include a corporation. 2 U.S.C. § 431(11).

Finally, the Act addresses knowing and willful violations.

2 U.S.C. §§ 437g(a)(5)(C), (6)(C), and 437g(d). “Knowing and willful” actions are those that were “taken with full knowledge of all the facts and a recognition that the action is prohibited by law.” 122 Cong. Rec. H3778 (daily ed. May 3, 1976). The knowing and willful standard requires knowledge that one is violating the law. FEC v. John A. Dramesi for Congress, 640 F.Supp. 985 (D.N.J. 1986). A knowing and willful violation may be established by “proof that the defendant acted deliberately and with knowledge that the representation was false.” U.S. v. Hopkins, 916 F.2d 207, 214-15 (5th Cir. 1990). An inference of a knowing and willful violation may be drawn “from the defendants’ elaborate scheme for disguising” their actions and their “deliberate convey[ance of] information they knew to be false to the Federal Election Commission.” *Id.*

B. Background

Future Tech is a Florida corporation founded by Mr. Leonard Keller on approximately August 17, 1988. *See Dun & Bradstreet Database*. According to the *sua sponte*, in 1989 Mr. Jimenez, at the time a national of the Republic of the Philippines, purchased a controlling 80% interest in the then bankrupt Future Tech for approximately \$30,000, eventually becoming Chairman of the Board and Chief Executive Officer of the corporation. *See Sua Sponte* at 1; *Dun & Bradstreet Database*. Future Tech’s principal business is the wholesale exportation of computer hardware, including products manufactured by related corporations under the trade name MarkVision, to Central

American, South American and Caribbean markets. The two related MarkVision corporations at issue in this matter are MarkVision Computers, Inc. and MarkVision Holdings, Inc. During the period at issue, Mr. Jimenez exercised direct control over these MarkVision entities. See Future Tech Factual Resume at ¶¶ I.9-10. Under Mr. Jimenez's control, Future Tech has grown to approximately \$251,261,000 in annual sales. See Dun and Bradstreet Database. Based on the available evidence, it appears that in approximately July 1994, Mr. Jimenez obtained permanent resident alien status.

C. Corporate and Foreign National Contributions

1. DNC Contributions

During the 1994 and 1996 election cycles, Future Tech, at Mr. Jimenez's direction, made a total of \$385,500 in contributions to the DNC's non-federal account. Mr. Jimenez made an additional \$50,000 contribution to the party's non-federal account in his own name. While all these contributions appear to have been made under Mr. Jimenez's direction, only a portion were made prior to July 1994, when Mr. Jimenez obtained permanent resident alien status in the United States. Accordingly, consistent with the *sua sponte* submissions and all facts presently known to the Commission, as the following chart demonstrates only the \$110,000 contributed prior to July 1994 is in apparent violation of 2 U.S.C. § 441e.³

³ Because Future Tech's 1993 DNC contributions are not at issue in the criminal matter, the corporation's plea agreement addresses only the combined \$100,000 DNC contributions made in 1994, and not the combined \$10,000 DNC contributions made in 1993.

<u>Contributor</u>	<u>Date</u>	<u>Amount</u>	
Future Tech Inc.	May 10, 1993	\$ 5,000	
Future Tech Inc.	May 10, 1993	5,000	
Future Tech Internat'l Inc.	March 24, 1994	50,000	
Future Tech Internat'l Inc.	<u>March 24, 1994</u>	<u>50,000</u>	Total \$110,000
Future Tech Internat'l Inc.	February 15, 1995	100,000	
Mark Jimenez	February 15, 1996	50,000	
Future Tech Internat'l Inc.	March 27, 1996	500	
Future Tech Internat'l Inc.	April 22, 1996	100,000	
Future Tech Internat'l Inc.	September 30, 1996	<u>75,000</u>	
	Total	\$435,500	

Foreign nationals are prohibited from making political contributions to both the federal and non-federal accounts of party committees. *See* 2 U.S.C. § 441e, MURs 2892, 3460, 4398 and 4638. Even where the contribution funds originate from a domestic source, a contribution is deemed a foreign national contribution if a foreign national directed the making of the contribution. *See* 11 C.F.R. § 110.4(a)(3). As noted, the above contributions were made with Future Tech funds at Mr. Jimenez's direction while he was still a foreign national. Accordingly, there is reason to believe that Future Tech violated 2 U.S.C. § 441e by making foreign national contributions.

2. Reimbursed Federal Candidate Contributions

According to the Factual Resumes accompanying the plea agreements, Future Tech, again at Mr. Jimenez's direction and with the consent and involvement of the four named Future Tech officers – Messrs. Keller, Ortiz, Leonardo and Narvasa, also reimbursed various employees of Future Tech, MarkVision Holdings, Inc. and MarkVision Computers, Inc. from 1993 through 1996 for approximately \$39,500 in federal contributions as follows:

Year	Amount	Recipient
1994	6,000	Ted Kennedy for Senate
1995	23,000	Clinton/Gore 96 Primary Committee
1996	2,000	Anne Henry for Congress (Arkansas)
1996	4,000	Roger H. Bedford for U.S. Senate (Alabama)
1996	2,000	Friends of Tom Strickland (Colorado)
1996	2,500	Torricelli for U.S. Senate
Total	\$39,500 ⁴	

The Factual Resumes explain the various methods used in reimbursing these employee contributions. According to Future Tech's Factual Resume, Mr. Jimenez would identify candidates for Future Tech's support and subsequently solicit, either directly or indirectly with the assistance of the four named officers, employees of Future Tech and the related MarkVision corporations, MarkVision Holdings, Inc. and MarkVision Computers, Inc., for political contributions with the clear understanding that the contributions would be reimbursed. *See* Future Tech Factual Resume at ¶ II.26. During the years 1994 through 1995, on Mr. Jimenez's explicit instructions and with the consent and involvement of the four named officers, the employee contributions were reimbursed via bonuses, payments or other payroll deduction from the payroll accounts of Future Tech and MarkVision Computers, Inc. *See id.* at ¶ II.26-27. However, beginning in approximately May 1996, following press scrutiny of the employee contributions to the Clinton/Gore campaign, Future Tech officers installed a cash reimbursements method. *See id.* at ¶ II.28. Under this method, Future Tech's treasurer, Mr. Narvasa, who maintained control of Mr. Jimenez's personal checking account, exchanged checks from Mr. Jimenez's personal account for cash that was available at Future Tech. *See id.* The

⁴ The amount at issue has been adjusted from the \$40,000 aggregate contribution amount disclosed in the *sua sponte*.

cash was then distributed by the treasurer to the conduit employees for the full amount of their contributions. *See id.* at ¶ II.56; *see also*, Ortiz Factual Resume at ¶ II.33.

While it appears that Respondents Keller, Ortiz, Leonardo and Narvasa acted pursuant to Mr. Jimenez's instructions, it is clear that Respondents' had knowledge of, consented to, and were involved in the conduit scheme carried out by Future Tech. *See* Future Tech Factual Resume at ¶ II.25. In fact, three of the named officers, Messrs. Ortiz, Leonardo and Narvasa also received reimbursements for federal candidate contributions made in their names. These four officers acted with the knowledge that they were violating the Act. *See id.* at ¶ II.28, ¶ II.39 and ¶ II.52, *see also*, Ortiz Factual Resume at ¶ II.20 and ¶ II.22.

The Act prohibits a corporation from making contributions in connection with a federal election, and prohibits any officer or director from consenting to any such contribution. 2 U.S.C. §411b(a). The Act further prohibits any person, including a corporation, from making a contribution in the name of another person. 2 U.S.C. §§ 441f, 431(11). Knowing and willful actions are taken with full knowledge of all the facts and with a recognition that the action is prohibited by law. 122 Cong. Rec. H3778 (daily ed. May 3, 1976). Accordingly, there is reason to believe that Future Tech knowingly and willfully violated 2 U.S.C. §§ 441b(a) and 441f by disguising its contributions to federal campaign committees through the straw transactions involving its employees and certain employees of the related MarkVision corporations. Similarly, there is reason to believe that MarkVision Holdings, Inc. and MarkVision Computers, Inc. knowingly and willfully violated 2 U.S.C. § 441f by allowing the use of their employees for the conduit contributions, and that MarkVision Computers, Inc.

additionally knowingly and willfully violated 2 U.S.C. § 441b(a) by being the source of a portion of the reimbursement funds. Further, there is reason to believe that Messrs. Keller, Ortiz, Leonardo and Narvasa each knowingly and willfully violated 2 U.S.C. §§ 441b(a) and 441f by their participation in the reimbursement scheme, and that Messrs. Ortiz, Leonardo and Narvasa also knowingly and willfully violated 2 U.S.C. § 441f by allowing their names to be used by Mr. Jimenez and Future Tech to make contributions.

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Lidia Azambuja

MUR: 4884

I. GENERATION OF MATTER

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. *See* 2 U.S.C. § 437g(a)(2). On December 1, 1997, the Commission received a *sua sponte* submission filed by counsel for Mr. Mark Jimenez, Chief Executive Officer of Future Tech International, Inc., disclosing that the corporation, at the instruction of Mr. Jimenez, reimbursed various individuals for federal political contributions made in their names.

II. FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, as amended ("the Act"), sets forth limitations and prohibitions on the type of funds which may be used in elections. Pursuant to 2 U.S.C. § 441f, no person shall make a contribution in the name of another person and no persons shall knowingly permit their name to be used to effect such a contribution.

Information in the Commission's possession evidences that Lidia Azambuja was reimbursed in cash by employees of Future Tech, at Mr. Jimenez's direction, for an October 29, 1996 contribution to Torricelli for U.S. Senate in the amount of \$500, thus, knowingly permitting her name to be used to make contributions by the corporations and Mr. Jimenez. Accordingly, there is reason to believe Lidia Azambuja violated 2 U.S.C. § 441f.

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Ernesto Bonfante

MUR: 4884

I. GENERATION OF MATTER

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. *See* 2 U.S.C. § 437g(a)(2). On December 1, 1997, the Commission received a *sua sponte* submission filed by counsel for Mr. Mark Jimenez, Chief Executive Officer of Future Tech International, Inc., disclosing that the corporation, at the instruction of Mr. Jimenez, reimbursed Ernesto Bonfante via company bonus or other corporate payment for a federal political contribution made in his name.

II. FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, as amended ("the Act"), sets forth limitations and prohibitions on the type of funds which may be used in elections. Pursuant to 2 U.S.C. § 441f, no person shall make a contribution in the name of another person and no persons shall knowingly permit their name to be used to effect such a contribution.

Information in the Commission's possession evidences that Respondent was reimbursed by Future Tech or related corporate entities, at Mr. Jimenez's direction, for a September 7, 1995 contribution to the Clinton/Gore '96 Primary Committee in the amount of \$1,000. thus, knowingly permitting his name to be used to make a contribution by the corporations and Mr. Jimenez. Accordingly, there is reason to believe Ernesto Bonfante violated 2 U.S.C. § 441f.

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Marcelino Brotonel

MUR: 4884

I. GENERATION OF MATTER

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. See 2 U.S.C. § 437g(a)(2). On December 1, 1997, the Commission received a *sua sponte* submission filed by counsel for Mr. Mark Jimenez, Chief Executive Officer of Future Tech International, Inc., disclosing that the corporation, at the instruction of Mr. Jimenez, reimbursed Marcelino Brotonel via company bonus or other corporate payment for a federal political contribution made in his name.

II. FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, as amended ("the Act"), sets forth limitations and prohibitions on the type of funds which may be used in elections. Pursuant to 2 U.S.C. § 441f, no person shall make a contribution in the name of another person and no persons shall knowingly permit their name to be used to effect such a contribution.

Information in the Commission's possession evidences that Respondent was reimbursed by Future Tech or related corporate entities, at Mr. Jimenez's direction, for a September 7, 1995 contribution to the Clinton/Gore '96 Primary Committee in the amount of \$1,000, thus, knowingly permitting his name to be used to make a contribution by the corporations and Mr. Jimenez. Accordingly, there is reason to believe Marcelino Brotonel violated 2 U.S.C. § 441f.

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Edgar Crespo

MUR: 4884

I. GENERATION OF MATTER

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. See 2 U.S.C. § 437g(a)(2). On December 1, 1997, the Commission received a *sua sponte* submission filed by counsel for Mr. Mark Jimenez, Chief Executive Officer of Future Tech International, Inc., disclosing that the corporation, at the instruction of Mr. Jimenez, reimbursed various individuals for federal political contributions made in their names.

II. FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, as amended ("the Act"), sets forth limitations and prohibitions on the type of funds which may be used in elections. Pursuant to 2 U.S.C. § 441f, no person shall make a contribution in the name of another person and no persons shall knowingly permit their name to be used to effect such a contribution.

Information in the Commission's possession evidences that Edgar Crespo was reimbursed in cash by employees of Future Tech, at Mr. Jimenez's direction, for an October 29, 1996 contribution to Torricelli for U.S. Senate in the amount of \$500, thus, knowingly permitting his name to be used to make contributions by the corporations and Mr. Jimenez. Accordingly, there is reason to believe Edgar Crespo violated 2 U.S.C. § 441f.

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Marcel Crespo

MUR: 4884

I. GENERATION OF MATTER

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. *See* 2 U.S.C. § 437g(a)(2). On December 1, 1997, the Commission received a *sua sponte* submission filed by counsel for Mr. Mark Jimenez, Chief Executive Officer of Future Tech International, Inc., disclosing that the corporation, at the instruction of Mr. Jimenez, reimbursed Marcel Crespo for a federal political contribution made in his name.

II. FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, as amended ("the Act"), sets forth limitations and prohibitions on the type of funds which may be used in elections. Pursuant to 2 U.S.C. § 441f, no person shall make a contribution in the name of another person and no persons shall knowingly permit their name to be used to effect such a contribution.

Information in the Commission's possession evidences that Respondent was reimbursed in cash by employees of Future Tech, at Mr. Jimenez's direction, for a September 25, 1996 contribution to Roger H. Bedford for U.S. Senate in the amount of \$2,000 and an October 29, 1996 contribution to Torricelli for U.S. Senate in the amount of \$500, thus, knowingly permitting his name to be used to make contributions by the corporations and Mr. Jimenez. Accordingly, there is reason to believe Marcel Crespo violated 2 U.S.C. § 441f.

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Reynaldo Crespo

MUR: 4884

I. GENERATION OF MATTER

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. *See* 2 U.S.C. § 437g(a)(2). On December 1, 1997, the Commission received a *sua sponte* submission filed by counsel for Mr. Mark Jimenez, Chief Executive Officer of Future Tech International, Inc., disclosing that the corporation, at the instruction of Mr. Jimenez, reimbursed Reynaldo Crespo via company bonuses or other corporate payments for federal political contributions made in his name.

II. FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, as amended ("the Act"), sets forth limitations and prohibitions on the type of funds which may be used in elections. Pursuant to 2 U.S.C. § 441f, no person shall make a contribution in the name of another person and no persons shall knowingly permit their name to be used to effect such a contribution.

Information in the Commission's possession evidences that Respondent was reimbursed by Future Tech or related corporate entities, at Mr. Jimenez's direction, for an October 15, 1994 contribution to Kennedy for Senate in the amount of \$1,000 and a September 7, 1995 contribution to the Clinton/Gore '96 Primary Committee in the amount of \$1,000, thus, knowingly permitting his name to be used to make contributions by the corporations and Mr. Jimenez. Accordingly, there is reason to believe Reynaldo Crespo violated 2 U.S.C. § 441f.

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Ricardo Crespo

MUR: 4884

I. GENERATION OF MATTER

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. *See* 2 U.S.C. § 437g(a)(2). On December 1, 1997, the Commission received a *sua sponte* submission filed by counsel for Mr. Mark Jimenez, Chief Executive Officer of Future Tech International, Inc. disclosing that the corporation, at the instruction of Mr. Jimenez, reimbursed Ricardo Crespo via company bonuses or other corporate payments for federal political contributions made in his name.

II. FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, as amended ("the Act"), sets forth limitations and prohibitions on the type of funds which may be used in elections. Pursuant to 2 U.S.C. § 441f, no person shall make a contribution in the name of another person and no persons shall knowingly permit their name to be used to effect such a contribution.

Information in the Commission's possession evidences that Respondent was reimbursed by *Future Tech* or related corporate entities, at Mr. Jimenez's direction, for an October 5, 1994 contribution to Kennedy for Senate in the amount of \$1,000 and a September 7, 1995 contribution to the Clinton/Gore '96 Primary Committee in the amount of \$1,000, thus, knowingly permitting his name to be used to make contributions by the corporations and Mr. Jimenez. Accordingly, there is reason to believe Ricardo Crespo violated 2 U.S.C. § 441f.

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Jacob Del Valle

MUR: 4884

I. GENERATION OF MATTER

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. See 2 U.S.C. § 437g(a)(2). On December 1, 1997, the Commission received a *sua sponte* submission filed by counsel for Mr. Mark Jimenez, Chief Executive Officer of Future Tech International, Inc., disclosing that the corporation, at the instruction of Mr. Jimenez, reimbursed Jacob Del Valle via company bonus or other corporate payment for a federal political contribution made in his name.

II. FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, as amended ("the Act"), sets forth limitations and prohibitions on the type of funds which may be used in elections. Pursuant to 2 U.S.C. § 441f, no person shall make a contribution in the name of another person and no persons shall knowingly permit their name to be used to effect such a contribution.

Information in the Commission's possession evidences that Respondent was reimbursed by Future Tech or related corporate entities, at Mr. Jimenez's direction, for a September 7, 1995 contribution to the Clinton/Gore '96 Primary Committee in the amount of \$1,000, thus, knowingly permitting his name to be used to make a contribution by the corporations and Mr. Jimenez. Accordingly, there is reason to believe Jacob Del Valle violated 2 U.S.C. § 441f.

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Raymund dos Remedios

MUR: 4884

I. GENERATION OF MATTER

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. *See* 2 U.S.C. § 437g(a)(2). On December 1, 1997, the Commission received a *sua sponte* submission filed by counsel for Mr. Mark Jimenez, Chief Executive Officer of Future Tech International, Inc., disclosing that the corporation, at the instruction of Mr. Jimenez, reimbursed Raymund dos Remedios for a federal political contribution made in his name.

II. FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, as amended ("the Act"), sets forth limitations and prohibitions on the type of funds which may be used in elections. Pursuant to 2 U.S.C. § 441f, no person shall make a contribution in the name of another person and no persons shall knowingly permit their name to be used to effect such a contribution.

Information in the Commission's possession evidences that Respondent was reimbursed in cash by employees of Future Tech, at Mr. Jimenez's direction, for an October 21, 1996 contribution to Anne Henry for Congress in the amount of \$1,000, thus, knowingly permitting his name to be used to make contributions by the corporation and Mr. Jimenez. Accordingly, there is reason to believe Raymund dos Remedios violated 2 U.S.C. § 441f.

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Rene dos Remedios

MUR: 4884

I. GENERATION OF MATTER

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. *See* 2 U.S.C. § 437g(a)(2). On December 1, 1997, the Commission received a *sua sponte* submission filed by counsel for Mr. Mark Jimenez, Chief Executive Officer of Future Tech International, Inc., disclosing that the corporation, at the instruction of Mr. Jimenez, reimbursed Rene dos Remedios for a federal political contribution made in her name.

II. FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, as amended ("the Act"), sets forth limitations and prohibitions on the type of funds which may be used in elections. Pursuant to 2 U.S.C. § 441f, no person shall make a contribution in the name of another person and no persons shall knowingly permit their name to be used to effect such a contribution.

Information in the Commission's possession evidences that Respondent was reimbursed in cash by employees of Future Tech, at Mr. Jimenez's direction, for an October 21, 1996 contribution to Anne Henry for Congress in the amount of \$1,000, thus, knowingly permitting her name to be used to make contributions by the corporation and Mr. Jimenez. Accordingly, there is reason to believe Rene dos Remedios violated 2 U.S.C. § 441f.

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Richard Esparragoza

MUR: 4884

I. GENERATION OF MATTER

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. *See* 2 U.S.C. § 437g(a)(2). On December 1, 1997, the Commission received a *sua sponte* submission filed by counsel for Mr. Mark Jimenez, Chief Executive Officer of Future Tech International, Inc., disclosing that the corporation, at the instruction of Mr. Jimenez, reimbursed Richard Esparragoza via company bonus or other corporate payment for a federal political contribution made in his name.

II. FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, as amended ("the Act"), sets forth limitations and prohibitions on the type of funds which may be used in elections. Pursuant to 2 U.S.C. § 441f, no person shall make a contribution in the name of another person and no persons shall knowingly permit their name to be used to effect such a contribution.

Information in the Commission's possession evidences that Respondent was reimbursed by Future Tech or related corporate entities, at Mr. Jimenez's direction, for a September 7, 1995 contribution to the Clinton/Gore '96 Primary Committee in the amount of \$1,000, thus, knowingly permitting his name to be used to make a contribution by the corporations and Mr. Jimenez. Accordingly, there is reason to believe Richard Esparragoza violated 2 U.S.C. § 441f.

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Jorge Fenton

MUR: 4884

I. GENERATION OF MATTER

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. *See* 2 U.S.C. § 437g(a)(2). On December 1, 1997, the Commission received a *sua sponte* submission filed by counsel for Mr. Mark Jimenez, Chief Executive Officer of Future Tech International, Inc., disclosing that the corporation, at the instruction of Mr. Jimenez, reimbursed Jorge Fenton via company bonus or other corporate payment for a federal political contribution made in his name.

II. FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, as amended ("the Act"), sets forth limitations and prohibitions on the type of funds which may be used in elections. Pursuant to 2 U.S.C. § 441f, no person shall make a contribution in the name of another person and no persons shall knowingly permit their name to be used to effect such a contribution.

Information in the Commission's possession evidences that Respondent was reimbursed by Future Tech or related corporate entities, at Mr. Jimenez's direction, for a September 7, 1995 contribution to the Clinton/Gore '96 Primary Committee in the amount of \$1,000, thus, knowingly permitting his name to be used to make a contribution by the corporations and Mr. Jimenez. Accordingly, there is reason to believe Jorge Fenton violated 2 U.S.C. § 441f.

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

RESPONDENT: *David Fried*

MUR: 4884

I. GENERATION OF MATTER

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. *See 2 U.S.C. § 437g(a)(2).* On December 1, 1997, the Commission received a *sua sponte* submission filed by counsel for Mr. Mark Jimenez, Chief Executive Officer of Future Tech International, Inc., disclosing that the corporation, at the instruction of Mr. Jimenez, reimbursed David Fried via company bonus or other corporate payment for a federal political contribution made in his name.

II. FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, as amended ("the Act"), sets forth limitations and prohibitions on the type of funds which may be used in elections. Pursuant to 2 U.S.C. § 441f, no person shall make a contribution in the name of another person and no persons shall knowingly permit their name to be used to effect such a contribution.

Information in the Commission's possession evidences that Respondent was reimbursed by Future Tech or related corporate entities, at Mr. Jimenez's direction, for a September 7, 1995 contribution to the Clinton/Gore '96 Primary Committee in the amount of \$1,000, thus, knowingly permitting his name to be used to make a contribution by the corporations and Mr. Jimenez. Accordingly, there is reason to believe David Fried violated 2 U.S.C. § 441f.

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Manuel Garcia

MUR: 4884

I. GENERATION OF MATTER

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. See 2 U.S.C. § 437g(a)(2). On December 1, 1997, the Commission received a *sua sponte* submission filed by counsel for Mr. Mark Jimenez, Chief Executive Officer of Future Tech International, Inc., disclosing that the corporation, at the instruction of Mr. Jimenez, reimbursed Manuel Garcia via company bonus or other corporate payment for a federal political contribution made in his name.

II. FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, as amended ("the Act"), sets forth limitations and prohibitions on the type of funds which may be used in elections. Pursuant to 2 U.S.C. § 441f, no person shall make a contribution in the name of another person and no persons shall knowingly permit their name to be used to effect such a contribution.

Information in the Commission's possession evidences that Respondent was reimbursed by Future Tech or related corporate entities, at Mr. Jimenez's direction, for a September 7, 1995 contribution to the Clinton/Gore '96 Primary Committee in the amount of \$1,000, thus, knowingly permitting his name to be used to make a contribution by the corporations and Mr. Jimenez. Accordingly, there is reason to believe Manuel Garcia violated 2 U.S.C. § 441f.

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

RESPONDENT: William Gearhart

MUR: 4884

I. GENERATION OF MATTER

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. *See* 2 U.S.C. § 437g(a)(2). On December 1, 1997, the Commission received a *sua sponte* submission filed by counsel for Mr. Mark Jimenez, Chief Executive Officer of Future Tech International, Inc., disclosing that the corporation, at the instruction of Mr. Jimenez, reimbursed William Gearhart via company bonus or other corporate payment for a federal political contribution made in his name.

II. FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, as amended ("the Act"), sets forth limitations and prohibitions on the type of funds which may be used in elections. Pursuant to 2 U.S.C. § 441f, *no person shall make a contribution in the name of another person and no persons shall knowingly permit their name to be used to effect such a contribution.*

Information in the Commission's possession evidences that Respondent was reimbursed by Future Tech or related corporate entities, at Mr. Jimenez's direction, for a September 7, 1995 contribution to the Clinton/Gore '96 Primary Committee in the amount of \$1,000, thus, knowingly permitting his name to be used to make a contribution by the corporations and Mr. Jimenez. Accordingly, there is reason to believe William Gearhart violated 2 U.S.C. § 441f.

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Luz Gonzalez

MUR: 4884

I. GENERATION OF MATTER

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. *See* 2 U.S.C. § 437g(a)(2). On December 1, 1997, the Commission received a *sua sponte* submission filed by counsel for Mr. Mark Jimenez, Chief Executive Officer of Future Tech International, Inc., disclosing that the corporation, at the instruction of Mr. Jimenez, reimbursed Luz Gonzalez via company bonus or other corporate payment for a federal political contribution made in her name.

II. FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, as amended ("the Act"), sets forth limitations and prohibitions on the type of funds which may be used in elections. Pursuant to 2 U.S.C. § 441f, no person shall make a contribution in the name of another person and no persons shall knowingly permit their name to be used to effect such a contribution.

Information in the Commission's possession evidences that Respondent was reimbursed by Future Tech or related corporate entities, at Mr. Jimenez's direction, for a September 7, 1995 contribution to the Clinton/Gore '96 Primary Committee in the amount of \$1,000, thus, knowingly permitting her name to be used to make a contribution by the corporations and Mr. Jimenez. Accordingly, there is reason to believe Luz Gonzalez violated 2 U.S.C. § 441f.

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Daria Haycox

MUR: 4884

I. GENERATION OF MATTER

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. See 2 U.S.C. § 437g(a)(2). On December 1, 1997, the Commission received a *sua sponte* submission filed by counsel for Mr. Mark Jimenez, Chief Executive Officer of Future Tech International, Inc., disclosing that the corporation, at the instruction of Mr. Jimenez, reimbursed Daria Haycox via company bonus or other corporate payment for a federal political contribution made in her name.

II. FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, as amended ("the Act"), sets forth limitations and prohibitions on the type of funds which may be used in elections. Pursuant to 2 U.S.C. § 441f, no person shall make a contribution in the name of another person and no persons shall knowingly permit their name to be used to effect such a contribution.

Information in the Commission's possession evidences that Respondent was reimbursed by Future Tech or related corporate entities, at Mr. Jimenez's direction, for a September 7, 1995 contribution to the Clinton/Gore '96 Primary Committee in the amount of \$1,000, thus, knowingly permitting her name to be used to make a contribution by the corporations and Mr. Jimenez. Accordingly, there is reason to believe Daria Haycox violated 2 U.S.C. § 441f.

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Marcia Juan

MUR: 4884

I. GENERATION OF MATTER

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. See 2 U.S.C. § 437g(a)(2). On December 1, 1997, the Commission received a *sua sponte* submission filed by counsel for Mr. Mark Jimenez, Chief Executive Officer of Future Tech International, Inc., disclosing that the corporation, at the instruction of Mr. Jimenez, reimbursed various individuals for federal political contributions made in their names.

II. FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, as amended ("the Act"), sets forth limitations and prohibitions on the type of funds which may be used in elections. Pursuant to 2 U.S.C. § 441f, no person shall make a contribution in the name of another person and no persons shall knowingly permit their name to be used to effect such a contribution.

Information in the Commission's possession evidences that Marcia Juan was reimbursed in cash by employees of Future Tech, at Mr. Jimenez's direction, for an October 29, 1996 contribution to Torricelli for U.S. Senate in the amount of \$500, thus, knowingly permitting her name to be used to make contributions by the corporations and Mr. Jimenez. Accordingly, there is reason to believe Marcia Juan violated 2 U.S.C. § 441f.

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Michael Marchese

MUR: 4884

I. GENERATION OF MATTER

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. See 2 U.S.C. § 437g(a)(2). On December 1, 1997, the Commission received a *sua sponte* submission filed by counsel for Mr. Mark Jimenez, Chief Executive Officer of Future Tech International, Inc., disclosing that the corporation, at the instruction of Mr. Jimenez, reimbursed company employee via company bonus or other corporate payment for a federal political contribution made in their name.

II. FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, as amended ("the Act"), sets forth limitations and prohibitions on the type of funds which may be used in elections. Pursuant to 2 U.S.C. § 441f, no person shall make a contribution in the name of another person and no persons shall knowingly permit their name to be used to effect such a contribution.

Information in the Commission's possession evidences that Michael Marchese was reimbursed by Future Tech or related corporate entities, at Mr. Jimenez's direction, for a November 3, 1995 contribution to the Clinton/Gore '96 Primary Committee in the amount of \$1,000, thus, knowingly permitting his name to be used to make a contribution by the corporations and Mr. Jimenez. Accordingly, there is reason to believe Michael Marchese violated 2 U.S.C. § 441f.

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Robert Nowell

MUR: 4884

I. GENERATION OF MATTER

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. See 2 U.S.C. § 437g(a)(2). On December 1, 1997, the Commission received a *sua sponte* submission filed by counsel for Mr. Mark Jimenez, Chief Executive Officer of Future Tech International, Inc., disclosing that the corporation, at the instruction of Mr. Jimenez, reimbursed Robert Nowell via company bonus or other corporate payment for a federal political contribution made in his name.

II. FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, as amended ("the Act"), sets forth limitations and prohibitions on the type of funds which may be used in elections. Pursuant to 2 U.S.C. § 441f, no person shall make a contribution in the name of another person and no persons shall knowingly permit their name to be used to effect such a contribution.

Information in the Commission's possession evidences that Respondent was reimbursed by Future Tech or related corporate entities, at Mr. Jimenez's direction, for a September 7, 1995 contribution to the Clinton/Gore '96 Primary Committee in the amount of \$1,000, thus, knowingly permitting his name to be used to make a contribution by the corporations and Mr. Jimenez. Accordingly, there is reason to believe Robert Nowell violated 2 U.S.C. § 441f.

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Maria C. Ortiz

MUR: 4884

I. GENERATION OF MATTER

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. *See* 2 U.S.C. § 437g(a)(2). On December 1, 1997, the Commission received a *sua sponte* submission filed by counsel for Mr. Mark Jimenez, Chief Executive Officer of Future Tech International, Inc., disclosing that the corporation, at the instruction of Mr. Jimenez, reimbursed various individuals for federal political contributions made in their names.

II. FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, as amended ("the Act"), sets forth limitations and prohibitions on the type of funds which may be used in elections. Pursuant to 2 U.S.C. § 441f, no person shall make a contribution in the name of another person and no persons shall knowingly permit their name to be used to effect such a contribution.

Information in the Commission's possession evidences that Maria C. Ortiz was reimbursed in cash by employees of Future Tech, at Mr. Jimenez's direction, for a September 25, 1996 contribution to Friends of Tom Strickland in the amount of \$1,000, thus, knowingly permitting her name to be used to make contributions by the corporations and Mr. Jimenez. Accordingly, there is reason to believe Maria C. Ortiz violated 2 U.S.C. § 441f.

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Ruth Ramirez

MUR: 4884

I. GENERATION OF MATTER

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. *See* 2 U.S.C. § 437g(a)(2). On December 1, 1997, the Commission received a *sua sponte* submission filed by counsel for Mr. Mark Jimenez, Chief Executive Officer of Future Tech International, Inc., disclosing that the corporation, at the instruction of Mr. Jimenez, reimbursed Ruth Ramirez via company bonus or other corporate payment for a federal political contribution made in her name.

II. FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, as amended ("the Act"), sets forth limitations and prohibitions on the type of funds which may be used in elections. Pursuant to 2 U.S.C. § 441f, no person shall make a contribution in the name of another person and no persons shall knowingly permit their name to be used to effect such a contribution.

Information in the Commission's possession evidences that Respondent was reimbursed by Future Tech or related corporate entities, at Mr. Jimenez's direction, for a September 7, 1995 contribution to the Clinton/Gore '96 Primary Committee in the amount of \$1,000, thus, knowingly permitting her name to be used to make a contribution by the corporations and Mr. Jimenez. Accordingly, there is reason to believe Ruth Ramirez violated 2 U.S.C. § 441f.

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Juan Ruiz

MUR: 4884

I. GENERATION OF MATTER

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. *See* 2 U.S.C. § 437g(a)(2). On December 1, 1997, the Commission received a *sua sponte* submission filed by counsel for Mr. Mark Jimenez, Chief Executive Officer of Future Tech International, Inc., disclosing that the corporation, at the instruction of Mr. Jimenez, reimbursed Juan Ruiz via company bonus or other corporate payment for a federal political contribution made in his name.

II. FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, as amended ("the Act"), sets forth limitations and prohibitions on the type of funds which may be used in elections. Pursuant to 2 U.S.C. § 441f, no person shall make a contribution in the name of another person and no persons shall knowingly permit their name to be used to effect such a contribution.

Information in the Commission's possession evidences that Respondent was reimbursed by Future Tech or related corporate entities, at Mr. Jimenez's direction, for a September 7, 1995 contribution to the Clinton/Gore '96 Primary Committee in the amount of \$1,000, thus, knowingly permitting his name to be used to make a contribution by the corporations and Mr. Jimenez. Accordingly, there is reason to believe Juan Ruiz violated 2 U.S.C. § 441f.

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Rolan Sacramento

MUR: 4884

I. GENERATION OF MATTER

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. See 2 U.S.C. § 437g(a)(2). On December 1, 1997, the Commission received a sua sponte submission filed by counsel for Mr. Mark Jimenez, Chief Executive Officer of Future Tech International, Inc., disclosing that the corporation, at the instruction of Mr. Jimenez, reimbursed Rolan Sacramento via company bonus or other corporate payment for a federal political contribution made in his name.

II. FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, as amended ("the Act"), sets forth limitations and prohibitions on the type of funds which may be used in elections. Pursuant to 2 U.S.C. § 441f, no person shall make a contribution in the name of another person and no persons shall knowingly permit their name to be used to effect such a contribution.

Information in the Commission's possession evidences that Respondent was reimbursed by Future Tech or related corporate entities, at Mr. Jimenez's direction, for a September 7, 1995 contribution to the Clinton/Gore '96 Primary Committee in the amount of \$1,000, thus, knowingly permitting his name to be used to make a contribution by the corporations and Mr. Jimenez. Accordingly, there is reason to believe Rolan Sacramento violated 2 U.S.C. § 441f.

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Enrique Sanchez

MUR: 4884

I. GENERATION OF MATTER

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. *See* 2 U.S.C. § 437g(a)(2). On December 1, 1997, the Commission received a *sua sponte* submission filed by counsel for Mr. Mark Jimenez, Chief Executive Officer of Future Tech International, Inc., disclosing that the corporation, at the instruction of Mr. Jimenez, reimbursed Enrique Sanchez via company bonus or other corporate payment for a federal political contribution made in his name.

II. FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, as amended ("the Act"), sets forth limitations and prohibitions on the type of funds which may be used in elections. Pursuant to 2 U.S.C. § 441f, no person shall make a contribution in the name of another person and no persons shall knowingly permit their name to be used to effect such a contribution.

Information in the Commission's possession evidences that Respondent was reimbursed by Future Tech or related corporate entities, at Mr. Jimenez's direction, for a September 7, 1995 contribution to the Clinton/Gore '96 Primary Committee in the amount of \$1,000, thus, knowingly permitting his name to be used to make a contribution by the corporations and Mr. Jimenez. Accordingly, there is reason to believe Enrique Sanchez violated 2 U.S.C. § 441f.

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Jennifer Seijas

MUR: 4884

I. GENERATION OF MATTER

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. *See* 2 U.S.C. § 437g(a)(2). On December 1, 1997, the Commission received a *sua sponte* submission filed by counsel for Mr. Mark Jimenez, Chief Executive Officer of Future Tech International, Inc., disclosing that the corporation, at the instruction of Mr. Jimenez, reimbursed Jennifer Seijas via company bonus or other corporate payment for a federal political contribution made in her name.

II. FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, as amended ("the Act"), sets forth limitations and prohibitions on the type of funds which may be used in elections. Pursuant to 2 U.S.C. § 441f, no person shall make a contribution in the name of another person and no persons shall knowingly permit their name to be used to effect such a contribution.

Information in the Commission's possession evidences that Respondent was reimbursed by Future Tech or related corporate entities, at Mr. Jimenez's direction, for a September 7, 1995 contribution to the Clinton/Gore '96 Primary Committee in the amount of \$1,000, thus, knowingly permitting her name to be used to make a contribution by the corporations and Mr. Jimenez. Accordingly, there is reason to believe Jennifer Seijas violated 2 U.S.C. § 441f.